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## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Chicago Ecological Services Field Office

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IN REPLY REFER TO:  
FWS/AES-CIFO/

February 3, 2009

Mr. Kevin Adler  
Remedial Project Manager  
United States Environmental Protection Agency  
Superfund Division (P-19J)  
Chicago, IL 60604

Dear Mr. Adler:

The purpose of this letter is to comment on the proposed Waukegan Harbor cleanup plan, dated October 2008. The option recommended by the Environmental Protection Agency, Option D2, proposes environmental dredging with residual sand cover to remove a majority of the remaining polychlorinated biphenyl (PCB) contamination from the sediment of Waukegan Harbor. If implemented, this option would benefit the fish and wildlife resources of the Waukegan area and Lake Michigan. You may, however, wish to consider some possible improvements to the design that would provide additional protection for fish and wildlife resources.

The recommended plan proposes to avoid dredging near the harbor walls to reduce the potential for collapse, and would leave a residual layer of contamination near the walls. A thick armored cap (layer of rocks) is proposed to be placed over this sediment to prevent contact by bottom feeding fish. It is unlikely that this rock layer would stop bioturbation and the entry of PCBs into the food chain. The rocks would create an attractive habitat for fish and invertebrates and increase the amount of biological activity in the harbor, near contaminated sediments, and would increase the potential for bioaccumulation of the remaining PCBs.

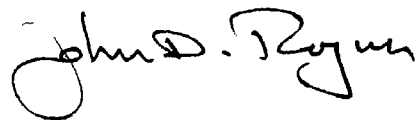
We recommend that you consider two possible options for addressing the contamination located near the walls. The first option includes removing the fine grain sediments located near the walls of the harbor. The fine grain sediments contain most of the PCBs and may not provide much structural support. The second option includes placement of a bioturbation barrier over the contaminated sediment prior to placement of the rock cap.

Mr. Kevin Adler

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We hope that this information will assist you in developing a remediation plan for the harbor. If you have any questions or wish to discuss this issue please contact Edward Karecki at 847-381-2253, ext. 14. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Rogner". The signature is fluid and cursive, with a large initial "J" and "R".

John D. Rogner  
Field Supervisor